UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

CRIMINAL No.

22cr10284

v.

Violation:

SAMMY SULTAN

<u>Count One</u>: Threats in Interstate Commerce

(18 U.S.C. § 875(c))

INFORMATION

At all times relevant to this Information:

General Allegations

- 1. Sammy SULTAN ("SULTAN"), was present in Hayward, California.
- 2. Tufts University is a university with a main campus in Medford, Massachusetts, within the District of Massachusetts. The Tufts University Police Department (TUPD) operates a dispatch office on that campus.
- 3. On or about May 28, 2021, SULTAN knowingly placed a series of telephone calls from California to TUPD's dispatch office in Massachusetts.
- 4. In a call to TUPD commencing at or about 6:41 a.m. EDT, SULTAN informed a TUPD employee that he wanted to speak to a "lady officer," said that he had entered a room on the Tufts University campus, and then said, "I have a lot of weapons;" "If the lady that comes into the room... I'm going to have to tase her;" "I'm going to go tase somebody;" "I'm gonna go tase somebody now;" and "I'm going to throw the phone away in the toilet and I'm going to tase somebody now." During the call, the sound of what appeared to be a taser being activated, and a handgun being racked or cycled, could be heard in the background. Contemporaneously with these sounds being made, SULTAN claimed that the sounds were an X26 taser and a pistol.

- 5. In a call to TUPD commencing at or about 6:54 a.m. EDT, SULTAN informed a TUPD employee that "I'm going to tase somebody."
- 6. In a call to TUPD commencing at or about 7:03 a.m. EDT, SULTAN informed a TUPD employee that "I'm going to go tase somebody now" and "If the lady comes back into the room, and tries to look under the bed, I have to tase her." During the call, the sound of what appeared to be a taser being activated, and a handgun being racked or cycled, could again be heard in the background. Contemporaneously with these sounds being made, SULTAN claimed that the first sound was an X26 taser, and also said he possessed pistols.
- 7. In a call to TUPD commencing at or about 7:25 a.m. EDT, SULTAN informed a TUPD employee that "If a lady comes into the room and sees me under the bed, I'll have to tase her;" "I'll tase her and then you'll know I'm telling the truth;" and "I'm going to go tase someone right now." During the call, the sound of what appeared to be a taser being activated, and a handgun being racked or cycled, could be heard in the background.
- 8. In a call to TUPD commencing at or about 8:16 a.m. EDT, SULTAN informed a TUPD employee that "I have a lot of weapons;" "I am going to go tase somebody;" "I have a taser;" and "You'll know what room I'm in when I go tase her."
- 9. In a call to TUPD commencing at or about 8:16 a.m. EDT, SULTAN informed a TUPD employee that "I am going to go tase someone" and "I am going to tase someone."
- 10. SULTAN made two other calls to TUPD, commencing at approximately 6:38 a.m. EDT and 7:02 a.m. EDT. On the first, SULTAN asked to speak to a "female officer," but made no threats. On the second, at 7:02 a.m., SULTAN hung up before saying anything.
- 11. SULTAN intended the calls referenced in paragraphs 3 through 10 to be threatening and knew that they would be viewed as threatening.

12. In response to SULTAN's calls, TUPD, assisted by officers from the City of Medford Police Department, carried out an hours-long, room-by-room search of numerous buildings on Tufts' campus in Medford, Massachusetts, but did not locate SULTAN on the campus.

COUNT ONE

Transmitting in Interstate and Foreign Commerce a Threat to Injure the Person of Another

(18 U.S.C. § 875(c))

The United States Attorney charges:

13. The United States Attorney re-alleges and incorporates by reference the

allegations in paragraphs 1 through 12 of this Information.

14. On or about May 28, 2021, in the District of Massachusetts and elsewhere, the

defendant,

SAMMY SULTAN

knowingly and willfully did transmit in interstate and foreign commerce from the State of

California to the District of Massachusetts a communication containing a threat to injure the

person of another, for the purpose of issuing a threat to injure the person of another.

All in violation of Title 18, United States Code, Section 875(c).

RACHAEL S. ROLLINS

United States Attorney

By: /s/ Timothy H. Kistner

Timothy H. Kistner

Assistant United States Attorney

Date: October 21, 2022